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March 30, 2022

BY ECF

The Honorable Alison J. Nathan
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

**RE: United States v. Pierre Girgis
22 Cr. 06 (AJN)**

Dear Judge Nathan:

I write to update the Court on the status of discovery in the above-captioned case and to seek a 30-day extension of today's deadline to propose a schedule for any defense motions to compel. The Government does not object to this application.

On March 9, 2022, the Government made a voluminous discovery production that included, inter alia, thousands of documents, forensic cell phone and electronic storage extractions, and thousands of recorded telephonic communications. The defense also understands that the Government anticipates making at least one additional Rule 16 production in the coming weeks. Given these developments and the defense's ongoing review of the discovery produced to date, we respectfully submit that it is premature to finalize a schedule for any motions to compel. Accordingly, the defense requests leave to provide an update and proposed motion-to-compel schedule by Monday, May 2, 2022, approximately 30 days from today.

Respectfully Submitted,



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Cc: AUSA Elinor Tarlow, Esq.
AUSA Kyle Wirshba, Esq.